

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF WEST VIRGINIA**

Friedrichs Harris, Administrator of the  
Estate of Evan M. Harris, deceased,

Plaintiff,

v.

Civil Action No. 2:18-cv-39  
Judge Bailey

Jennifer Randall Reyes and  
Big Top Counseling & Consulting, LLC,

Defendants.

**FRIEDRICHS HARRIS CONSENT TO SETTLEMENT AND DISTRIBUTION**

I Friedrichs Harris do hereby consent to the settlement reached with the Defendants and I consent to the proposed distribution. In support of both, I offer the following:

1. I am a beneficiary of the Estate of Evan M. Harris.
2. Evan M. Harris is my son.
3. My wife is a lawyer and a former prosecuting attorney and I am generally familiar with the litigation process, as a medical doctor.
4. I was physically present in Morgantown, West Virginia for the Mediation that took place in this matter on the 1<sup>st</sup> day of August 2019, with Stephen J. Dalesio serving as the mediator.
5. I was involved in the negotiation of the settlement terms, along with my wife Kathleen Stull Harris.
6. At all times during the case and mediation, we were guided by David A. Sims and I believed that he acted in our best interests and advocated for the Estate of Evan M. Harris.



7. I know what the dollar amount of the settlement is. I know what the attorney fees are, 40% of that amount, and I know what expenses have been incurred by Law Offices of David A. Sims, PLLC to pursue the litigation. I am asking that the Court approve the fees and expenses of Law Offices of David A. Sims, PLLC.
8. I believe that David A. Sims has earned his fee in this case and the expenses are fair and reasonable.
9. I proposed a distribution wherein my wife is to receive 100% of the settlement proceeds.
10. I proposed the distribution because my wife is deserving and our daughter, Emily Harris, has refused to accept any of the settlement proceeds in this litigation, after the payment of attorney's fees and costs.
11. My wife and I have discussed the proposed distribution and I am consenting to it, along with my daughter Emily Harris.
12. My wife and I have discussed the proposed distribution with our daughter Emily Harris and she has expressed an agreement to it also.
13. I think the settlement and the distribution are in the best interests of the beneficiaries of the Estate of Evan M. Harris.

Executed this 27 day of August 2019.

  
Friedrichs Harris

Taken to and subscribed to me on this 27 day of August 2019.

  
Notary Public

JULIAN G. BAUDIER, JR.  
Notary Public, Parish of Orleans, State of La.  
My Commission is issued for life.  
La. State Bar # 2333

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF WEST VIRGINIA

Friedrichs Harris, Administrator of the  
Estate of Evan M. Harris, deceased,

Plaintiff,

v.

Civil Action No. 2:18-cv-39  
Judge Bailey

Jennifer Randall Reyes and  
Big Top Counseling & Consulting, LLC,

Defendants.

**KATHLEEN STULL HARRIS CONSENT TO SETTLEMENT AND DISTRIBUTION**

I Kathleen Stull Harris do hereby consent to the settlement reached with the Defendants and I consent to the proposed distribution. In support of both, I offer the following:

1. I am a beneficiary of the Estate of Evan M. Harris.
2. Evan M. Harris is my son.
3. My husband is a medical doctor and is generally familiar with the litigation process.
4. I am a lawyer and a former prosecuting attorney and I am generally familiar with the litigation process.
5. I was physically present in Morgantown, West Virginia for the Mediation that took place in this matter on the 1<sup>st</sup> day of August 2019, with Stephen J. Dalesio serving as the mediator.
6. I was involved in the negotiation of the settlement terms, along with my husband Friedrichs Harris, M.D.



7. At all times during the case and mediation, we were guided by David A. Sims.
8. I believe that David A. Sims acted in our best interests and advocated for the Estate of Evan M. Harris.
9. I know what the dollar amount of the settlement is. I know what the attorney fees are, 40% of that amount, and I know what expenses have been incurred by Law Offices of David A. Sims, PLLC to pursue the litigation.
10. I am asking that the Court approve the fees and expenses of Law Offices of David A. Sims, PLLC.
11. I believe that David A. Sims has earned his fee in this case and the expenses are fair and reasonable.
12. I know that my husband, Friedrichs Harris, has proposed a distribution wherein I am to receive 100% of the settlement proceeds.
13. He proposed the distribution because he has refused to receive any of the settlement proceeds and expressed that I should receive all of the money from the settlement proceeds.
14. Our daughter, Emily Harris, has refused to accept any of the settlement proceeds in this litigation and expressed that I should receive all of the money from the settlement proceeds.
15. My husband and I have discussed the proposed distribution, along with our daughter Emily Harris, and I am consenting to it because it is in the best interests of our family.

16. My husband and I have discussed the proposed distribution with our daughter Emily Harris and she expressed agreement to it also as demonstrated by the Consent she has executed.
17. I think the settlement and the distribution are in the best interests of the beneficiaries of the Estate of Evan M. Harris.

Executed this 27 day of August 2019.

Kathleen Stull Harris  
Kathleen Stull Harris

Taken to and subscribed to me on this 27 day of August 2019.

[Signature]  
Notary Public

**JULIAN G. BAUDIER, JR.**  
Notary Public, Parish of Orleans, State of La.  
My Commission is issued for life.  
La. State Bar # 2189

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF WEST VIRGINIA**

Friedrichs Harris, Administrator of the  
Estate of Evan M. Harris, deceased,

Plaintiff,

v.

Civil Action No. 2:18-cv-39  
Judge Bailey

Jennifer Randall Reyes and  
Big Top Counseling & Consulting, LLC,

Defendants.

**EMILY HARRIS CONSENT TO SETTLEMENT AND DISTRIBUTION**

I Emily Harris do hereby consent to the settlement reached with the Defendants and  
I consent to the proposed distribution. In support of both, I offer the following:

1. I am a beneficiary of the Estate of Evan M. Harris.
2. Evan M. Harris is my brother.
3. My Mom is a lawyer and a former prosecuting attorney and my Dad as a physician is generally familiar with the litigation process.
4. I was not physically present in Morgantown, West Virginia for the Mediation that took place in this matter on the 1<sup>st</sup> day of August 2019, with Stephen J. Dalesio serving as the mediator, but I was informed about what occurred.
5. I was not involved in the negotiation of the settlement terms, but they have been thoroughly discussed with me by my Mom, Kathleen Stull Harris, and my Dad, Friedrichs Harris.



6. At all times during the case and mediation, we were guided by David A. Sims and I believed that he acted in our best interests and advocated for the Estate of Evan M. Harris.
7. I know what the dollar amount of the settlement is. I know what the attorney fees are, 40% of that amount, and I know what expenses have been incurred by Law Offices of David A. Sims, PLLC to pursue the litigation. I am asking that the Court approve the fees and expenses of Law Offices of David A. Sims, PLLC.
8. I believe that David A. Sims has earned his fee in this case and the expenses are fair and reasonable.
9. My father Friedrichs Harris proposed a distribution wherein my Mom, Kathleen Stull Harris, is to receive 100% of the settlement proceeds.
10. My father Friedrichs Harris proposed the distribution because my Mom, Kathleen Stull Harris, is deserving of the money due to her loss. I too believe that my Mom deserves the money from the settlement.
11. My Dad Friedrichs Harris has refused to accept any of the settlement proceeds in this litigation.
12. I am refusing any settlement proceeds and recommending to the Court that the entirety of the proceeds go to my mother, Kathleen Stull Harris.
13. My Mom, Dad and I have discussed the proposed distribution and I am consenting to it as I think it is fair and equitable based upon the circumstances.


14. We have all discussed the proposed distribution, at length, and we are all in agreement that it is the best thing for our family that my Mom Kathleen Stull Harris receive the entirety of the settlement proceeds.

15. I think the settlement and the distribution are in the best interests of the beneficiaries of the Estate of Evan M. Harris.

Executed this 27 day of August 2019.

  
Emily Harris

Taken to and subscribed to me on this 27 day of August 2019.

  
Notary Public  
JULIAN G. BAUDIER, JR.  
Notary Public, Parish of Orleans, State of La.  
My Commission is issued for life.  
La. State Bar # 2363